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Pro Se Litigant

**IN THE UNITED STATES DISTRICT COURT DISTRICT FOR
THE DISTRICT OF UTAH, CENTRAL DIVISION**

RUSSELL G. GREER,

Plaintiff

v.

JOSHUA MOON, publisher of the website
Kiwi Farms, **and KIWI FARMS**, a website

Defendants

**PLAINTIFF'S MOTION FOR
ALTERNATIVE SERVICE**

Case No.:

Judge

Pursuant to *Utah Rules of Civil Procedure 4(d)(5)*, Plaintiff Russell Greer asks:

1. While preparing to file this Complaint, Greer has been unable to locate a physical address to serve Defendant at.
2. Defendant did give Plaintiff a mailbox address to serve the Complaint at. However, that would not satisfy the service by mail requirements under the *Utah Rules of Civil Procedure* because Defendant would not be there physically to personally sign for the mail.
3. On the website that Defendant Moon runs, he has designated an email address to receive what he calls “frivolous legal issues” at for them to end up “in the dumpster”. The email address is: legal@kiwifarms.net EXHIBIT A.
4. Greer requests to serve Defendant via electronic mail.

ALTERNATIVE SERVICE

5. Alternative service is granted when reasonable diligence has been made to locate Defendant. *Motion for Alternative Service*. Utah Courts.
(https://www.utcourts.gov/howto/service/alternate_service.html).
6. As explained in the facts, Plaintiff has made efforts to locate the Defendant, in preparation of the lawsuit.
7. Given that this case is based upon a website, managed by Defendant, that has been infringing and harassing Greer, and that Defendant has designed an e-mail to accept legal documents, e-mail service should be allowed. *Rio Props. v. Rio Int’l Interlink*, 284 F.3d 1007 (9th Cir. 2002) (found that service by e-mail upon an electronic gambling website was proper).

PRAYER FOR RELIEF

8. Plaintiff asks that alternative service be granted and for service to be made via email to:
legal@kiwifarms.net

DATED: September 5th, 2020

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to be 'R Greer', with a stylized, wavy line extending to the right.

Russell Greer
Pro Se Litigant
/rgreer/

EXHIBIT A

